

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major Draft Permit No. F-01-012

MODERN WELDING COMPANY

ELIZABETHTOWN, KENTUCKY

April 17, 2001

SEAN ALTERI

SOURCE DESCRIPTION

Modern Welding Company of Elizabethtown fabricates metal storage tanks. Modern Welding purchases metal to form the storage tanks. The steel is formed and welded. After fabrication, the tanks are gritblasted and coated with paint or a fiberglass coating.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations.

401 KAR 63:020, Potentially hazardous matter or toxic substances.

COMMENTS:

The welding operations are comprised of various welding machines located in the plant. The majority of the welders are Miller welders, in addition to a few Lincoln welders. According to plant manager, Mr. George Kauffield, several welders have been added since 1985. Therefore, 401 KAR 59:010, New process operations, applies to the welding operations. To comply with 401 KAR 59:010, emissions from the welding operations shall be less than 2.34 lb/hr, each. Also, visible emissions from each facility shall not be equal or greater than 20% opacity. In addition to 401 KAR 59:010, 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the welding operation. To comply with this regulation, a mobile x-arm welding fume exhaust/filtration system must be in place when welding using welding material containing chromium and nickel.

Emissions from the surface coating and fiberglass coating are subject to 401 KAR 59:010, New process operations. The particulate matter emissions from the surface coating operations shall not exceed 2.34 lb/hr. Also, visible emissions shall not equal or exceed 20% opacity. To preclude Title V and the applicability of 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, Modern Welding requests operating and emission limitations to restrict the plantwide VOC usage and emission rates to be less than 99 tons per year. Also to preclude Title V applicability, the emissions of combined hazardous air pollutants shall not equal or exceed 25 tons per year, and the emissions of an individual hazardous air pollutant shall not equal or exceed 10 tons per year.

The sandblasting/gritblasting is considered by the Division as an insignificant activity. However, 401 KAR 59:010, New process operations, applies to the gritblasting operation.

EMISSION AND OPERATING CAPS DESCRIPTION:

1. Volatile organic compound (VOC) emissions shall not exceed 99 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
2. Hazardous air pollutants (HAPs) emissions shall not exceed 9 tons per year individually and 24 tons per year combined based on a rolling 12 month total for the entire source to preclude a major source Title V review.
3. A mobile x-arm welding fume exhaust/filtration system must be in place when welding using welding material containing chromium and nickel takes place. This control is required as toxics RACT (reasonable available control technology) under 401 KAR 63:020, Potentially hazardous and toxic substances.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.